

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|----------------------|---|----------------------------------|
| DONDRE ADAMS, |) | |
| |) | |
| Plaintiff, |) | No. 19 C 5452 |
| |) | |
| v. |) | Honorable Franklin U. Valderrama |
| |) | Judge Presiding |
| ROB JEFFREYS, et al. |) | |
| |) | |
| Defendants. |) | |

**DEFENDANTS JEFFREYS, THIGPEN AND STURCH'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

NOW COME Defendants Rob Jeffreys, Bernita Thigpen and Michael Sturch, by and through their attorney, KWAME RAOUL, Illinois Attorney General, pursuant to Fed.R.Civ.P. 12(b)(6) and hereby move to dismiss Plaintiff's Complaint for failing to state a claim against them, as fully set forth in their Memorandum of Law in Support of their Motion to Dismiss. Defendants respectfully request that this Court grant this motion in their favor.

Dated: November 6, 2020

Respectfully submitted,

KWAME RAOUL
Attorney General of the State of Illinois

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